

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. 08 CR 122-7
v	)	
	)	Hon. Maria Valdez
	)	
TERRY PETEN,	)	
	)	
Defendant.	)	

**MOTION FOR RELEASE PENDING TRIAL**

NOW COMES Defendant, Terry Peten, by and through his attorney, Ross M. Eagle and moves this Honorable Court to release Mr. Peten from detention pursuant to 18 U.S.C. §3141(a) and §3142(a). In support of this motion, Defendant states as follows:

1. Mr. Peten was arrested on February 12, 2008 under the above-listed complaint and brought before Magistrate Judge Valdez for an initial appearance the following day.
2. On February 13, 2008, Mr. Peten's detention hearing was continued until February 15, 2008.
3. On February 15, 2008, Mr. Peten waived his right to a detention hearing without prejudice reserving the right to move at a later time for release.
4. Mr. Peten now wishes to exercise his right to move this Honorable Court to hold a detention hearing and release him from detention under conditions acceptable to the Court.

WHEREFORE, Defendant, Terry Peten, respectfully requests this Honorable Court grant him a detention hearing and release him under conditions pursuant to statute.

Respectfully submitted,

/s/ Ross M. Eagle  
Ross M. Eagle, Attorney for  
Defendant Terry Peten

Ross M. Eagle  
Jester, Kenworthy & Eagle LLC  
53 West Jackson Boulevard, Suite 1324  
Chicago, Illinois 60604  
312-435-9901  
#6216008

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TERRY PETEN,	)	
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**NOTICE OF FILING**

To: Terra Brown	Pretrial Services
Assistant United States Attorney	219 South Dearborn Street
219 South Dearborn Street	Room 15100
Fifth Floor	Chicago, Illinois 60604
Chicago, Illinois 60604	

Please take notice that on April 10, 2008, I caused to be filed with the Clerk of the United States District Court of the Northern District of Illinois, Eastern Division, Terry Peten's Motion to For Bond, a copy of which is attached and hereby served upon you.

/s/ Ross M. Eagle

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Ross M. Eagle, Attorney for  
Defendant Terry Peten

53 W. Jackson Blvd. #1324  
Chicago, Illinois 60604  
312-435-9901

**Certificate of Service**

I, Ross M. Eagle, an attorney, certifies that in compliance with the Order of the United States District Court on Electronic Filing, a copy of the foregoing Motion to Modify Conditions of Bond was served by electronic means on the above listed persons on April 10, 2008

/s/ Ross M. Eagle